

EXHIBIT A

NASHVILLE DIVISION

INDIANA PUBLIC RETIREMENT SYSTEM,)	Civil Action No. 3:19-cv-00407
Individually and on Behalf of All Others)	
Similarly Situated,)	<u>CLASS ACTION</u>
)	
Plaintiff,)	Judge Eli J. Richardson
)	Magistrate Judge Alistair E. Newbern
vs.)	
)	DECLARATION OF JEFFREY M. GILL IN
MICHAEL T. CARTWRIGHT, KIRK R.)	SUPPORT OF LEAD PLAINTIFF’S
MANZ and ANDREW W. McWILLIAMS,)	MOTION FOR CLASS CERTIFICATION
)	
Defendants.)	
)	
)	

I, JEFFREY M. GILL, declare as follows:

1. I respectfully submit this Declaration in support of Lead Plaintiff's Motion for Class Certification. I have personal knowledge of the statements herein and, if called upon as a witness, could and would competently testify thereto.

2. I am the Senior Benefits Counsel for Lead Plaintiff Indiana Public Retirement System (“INPRS”). As Senior Benefits Counsel, I participate in and oversee decisions regarding the administration of INPRS. INPRS seeks appointment as a class representative in this action.

3. INPRS is one of the largest 100 pension funds in the United States, with approximately \$36.9 billion in assets under management at the end of fiscal year 2020. INPRS serves the needs of approximately 467,000 members and retirees representing more than 1,200 participating employers, including public universities, school corporations, municipalities and state agencies.

4. INPRS purchased 136,880 shares of AAC Holdings Inc. (“AAC”), common stock between March 8, 2017 and November 5, 2018, and suffered approximately \$1 million in losses.

5. INPRS understands that the Private Securities Litigation Reform Act of 1995 was intended to encourage institutional investors to direct securities class actions. Should it be appointed as a class representative, INPRS – as a large, sophisticated institutional investor – is committed to continuing to vigorously prosecute this litigation.

6. INPRS has monitored the progress of this litigation and the active participation of Lead Counsel Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) in its prosecution. For example, INPRS received and reviewed periodic updates and other correspondence from Robbins Geller regarding various aspects of this case, including: (1) the filing of a comprehensive complaint; (2) the defending of those claims through motion to dismiss briefing; and (3) the bankruptcy proceeding involving AAC. INPRS has also satisfied its discovery obligations including by serving Rule 26 Initial Disclosures.

7. If appointed as a class representative, INPRS will continue to actively direct this litigation in order to maximize the recovery. INPRS understands that it owes a duty to all members of the proposed class to provide fair and adequate representation and would continue to work with Robbins Geller to obtain the largest recovery for the class consistent with good faith, sound judgment and meritorious advocacy.

8. INPRS intends to continue to provide fair and adequate representation by, among other things, directing the efforts of Robbins Geller.

9. INPRS selects Robbins Geller as proposed class counsel based on the Firm’s substantial experience and expertise in prosecuting securities class actions.

I declare, pursuant to the laws of the United States of America, that the foregoing is true and correct. Executed this 1st day of July, 2021, at _____, Indiana.



JEFFREY M. GILL